#### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF	CASE NO. 19-01722-MCF
JOSE LUIS CORREA GONZALEZ XXX-XX-3630 Debtor(s)	CHAPTER 13 ASSET CASE

## REPLY TO THE TRUSTEE'S MOTION TO DISMISS DATED JULY 17, 2020

#### TO THE HONORABLE COURT

**NOW COMES**, Debtor through the undersigned attorney and very respectfully states and prays as follows:

- 1. In December 18, 2019 Petitioner amended schedule I and J. In Schedule I Debtor reported his entire social security benefit of \$1,011. In Schedule J debtor reported a monthly chapter 13 payment of \$2,040. The above was based on the following premise as stated in our motion then: "Amended Schedule I is submitted to inform Debtor's social security benefit of \$1,011 has been restored effective January 2020. As per conversation with attorney, Myriam Hernandez, ASUME representative; ASUME discontinued the Social Security Administration retention order of \$600 on December 13, 2019".
- 2. Petitioner has informed us that, as of today, ASUME has continued with the Social Security Administration retention order of \$600 (actually \$621). See attached social security deposits of \$414.40 in the bank statements.
- 3. Also, attached ASUME account summary. It reflects the payments of \$621 received from the social security administration retention order.
- 4. Accordingly, Petitioner's monthly payment to the chapter 13 Trustee should be reduced. His arrears with ASUME have also been reduced and will continue to be reduced because of the direct payments received from the social security administration retention order still in effect.
- 5. Petitioner has informed us that he incurred in arrears for various reasons among them the following:
  - A. Last Monday Petitioner was released from the Veteran's Hospital. He was admitted to the hospital on an emergency basis from a fall he suffered. With the fall he bruised several ribs, one of his hands and one of his legs. He was in the hospital for approximately 11 days.

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- B. Petitioner's mother retirement pay direct deposit, for reasons unknown, was stopped from the middle of February 2020 through May 2020. During that time he helped her with her rent payment and food expenses.
- C. Petitioner also suffered a minor car accident. His vehicle is in need of repairs.
- 6. Petitioner is filing amended schedule I and J and amended plan.

**WHEREFORE**, for the above stated reasons it is respectfully requested from this Honorable Court to enter an order denying the trustee's motion to dismiss.

I HEREBY CERTIFY: that a copy of this motion was electronically filed by debtor using the CM/ECF System which will send a notification to the standing Chapter 13 Trustee and to all registered interested parties. In addition, a copy of this motion was sent by debtor's attorney to the debtor at the address of record and to all creditors and parties in interest appearing in the master address list not registered in CM/ECF.

RESPECTFULLY SUBMITTED IN CAROLINA, PUERTO RICO, AUGUST 21, 2020.

/s/ Ramón F. López
RAMON F. LOPEZ, ESQ. (203813)
RAMON F. LOPEZ LAW OFFICES, P.S.C.
ATTORNEY FOR THE ABOVE NAMED DEBTOR
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# Servicios en Línea

Número de caso: 0257218

Nombre de PNC: Jose L

Correa

Gonzalez

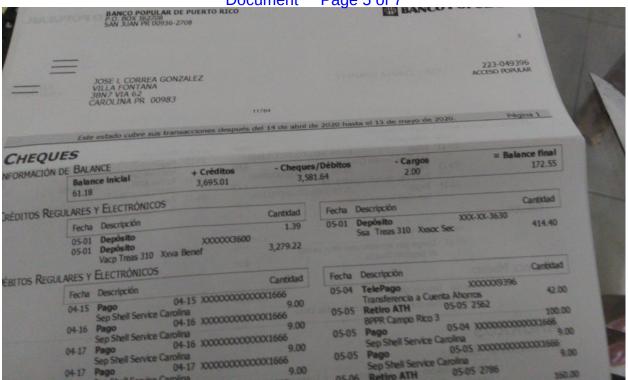
Núm. de participante: 00000001149157

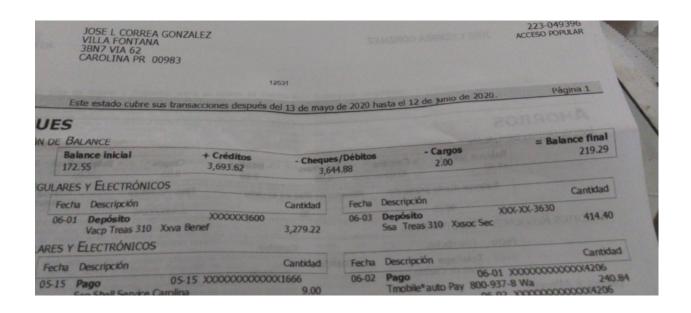
Fecha de recibido	Cantidad de Pago	Referencia
08/05/2020	\$540.00	030012484
08/03/2020	\$621.60	029996498
07/03/2020	\$541.20	029865869
07/02/2020	\$621.60	029856588
06/03/2020	\$621.60	029691614
05/01/2020	\$621.60	029534324
04/03/2020	\$621.60	029424009
03/06/2020	\$1,212.70	029297768
03/03/2020	\$621.60	029278414
02/03/2020	\$621.60	029136706

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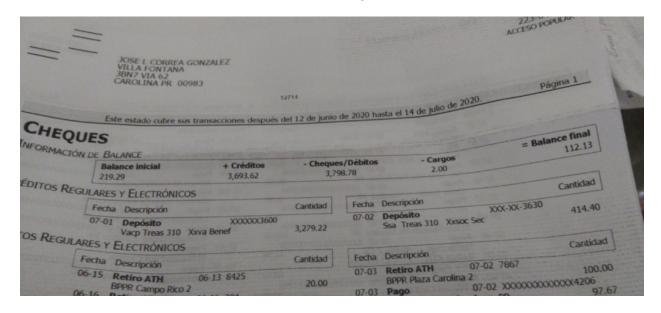


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